

REC'D TN  
REGULATORY AUTH.

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

OFFICE OF THE  
EXECUTIVE SECRETARY

IN RE: ALL TELEPHONE COMPANIES TARIFF FILINGS REGARDING  
RECLASSIFICATION OF PAY TELEPHONE SERVICE.

Docket No. 97-00409

---

MOTION TO EXCEED FORTY DISCOVERY REQUESTS

---

The Tennessee Payphone Owners Association ("TPOA") requests, pursuant to TRA Rule 1220-1-2-.11, permission to exceed forty (40) discovery requests regarding the cost study filed in this proceeding by Sprint/United Telephone Southeast, Inc. ("Sprint" or "United").

The attached discovery requests contain sixty-four questions, including sub-parts. Because of the complexity of the cost study, it is necessary for TPOA to ask more questions than would be asked, for example, in a complaint case or a tariff filing. As the Authority held in its Order of June 8, 2001, "good cause exists for further review of the methodology used in UTSE's cost studies." That further review requires asking more than forty questions in order to determine why the company's study produces "cost based" rates which are twice the prices charged by BellSouth and Citizens.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Walker", written over the printed name.

Henry Walker

BOULT, CUMMINGS, CONNERS & BERRY, PLC

414 Union Street, Suite 1600

P.O. Box 198062

Nashville, TN 37219

(615) 252-2363

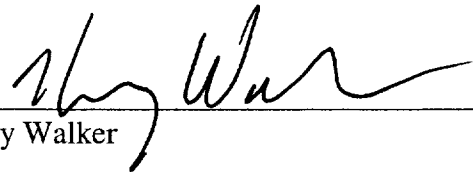
Counsel for Tennessee Payphone Owners' Association

### CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2001 a copy of the foregoing document was served on the parties of record, via U.S. Mail, addressed as follows:

James Wright, Esquire  
United Telephone-Southeast  
14111 Capitol Blvd.  
Wake Forest, NC 27587

Vincent Williams, Esq.  
Consumer Advocate Division of the Attorney General's Office  
426 5<sup>th</sup> Ave., North, 2<sup>nd</sup> Floor  
Nashville, TN 37243

  
Henry Walker